

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEBRASKA

NADIA BIGLARI,

Plaintiff,

v.

UNIVERSITY OF NEBRASKA LINCOLN, by  
and through its Board of Regents; ERIC  
DODDS; in his official capacity and  
individual capacity,

Defendants.

Case No. 4:22-CV-3268

**UNOPPOSED MOTION FOR  
EXTENSION OF TIME TO FILE  
RESPONSIVE PLEADING OR MOTION**

COMES NOW Defendant University of Nebraska Lincoln, by and through its Board of Regents (“BRUN”), and pursuant to Federal Rule of Civil Procedure 6(b)(1)A), moves the Court for an Order extending Defendant’s time to respond to Plaintiff’s Complaint in this action from April 6, 2023, to April 21, 2023. In support hereof, Defendant states the following:

1. Defendant BRUN received the Summons and Complaint on or about February 13, 2023. On March 3, 2023, counsel for BRUN moved to extend the deadline to respond to Plaintiff’s Complaint to April 6, 2023.

2. Defendant Eric Dodds in his official capacity and individual capacity, (“Dodds”) received the Summons and Complaint on or about March 2, 2023. On March 22, 2023, counsel for Dodds moved to extend the deadline to respond to Plaintiff’s Complaint to April 21, 2023.

3. For ease and consistency, counsel for Defendant BRUN and Defendant Dodds request the same deadline to respond to Plaintiff’s Amended Complaint that date being April 21, 2023.

4. In addition, counsel for BRUN needs additional time to prepare a responsive pleading to the Amended Complaint that spans 32-pages, 127 paragraphs.

5. Good cause exists for the extension requested herein, as Defendant requires additional time to investigate the facts of this case and prepare a response to Plaintiff's Amended Complaint.

6. Plaintiff's counsel has indicated to the undersigned that he does not oppose this motion and agrees to an extension as requested herein.

7. Defendant McCune's counsel has indicated to the undersigned that he does not oppose this motion and agrees to an extension as requested herein.

WHEREFORE Defendant requests the Court enters an Order granting an extension of Defendant's time to respond to Plaintiff's Amended Complaint, such that the deadline for Defendant to respond to Plaintiff's Amended Complaint shall be April 21, 2023.

DATED this 4th day of April, 2023.

BOARD OF REGENTS OF THE  
UNIVERSITY OF NEBRASKA, Defendant

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**CERTIFICATE OF SERVICE**

I hereby certify that on April 4, 2023, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all parties who have entered an appearance in this case as well as electronically transmitted.

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/s/ Lily Amare  
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